

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

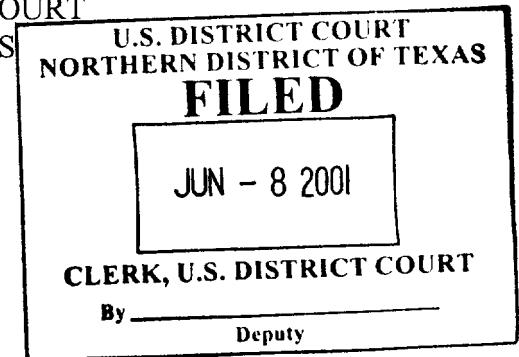
JANE DOE (a pseudonym) on behalf of, herself and all others similarly situated,

Plaintiff,

V.

OBJECTSPACE, INC.,

Defendant.



NO

3-31 C 11091

NOTICE OF REMOVAL

Defendant ObjectSpace, Inc. (“Defendant”) file this Notice of Removal and states:

STATEMENT OF THE CASE

1. ObjectSpace, Inc. has been named as Defendant in a lawsuit filed in the County Court at Law No. 4 of Dallas County, Texas, styled *Jane Doe (a pseudonym) on behalf of Herself and all others similarly situated*, Cause No. 01-05742-D. Defendant was served on June 1, 2001.

 2. In her Original Petition, Plaintiff asserts that Defendant failed to provide notice to the proposed class of a mass layoff required under 29 U.S.C. § 2101, *et seq.* the Worker Adjustment and Retraining Notification Act (“WARN”).

REMOVAL BASED ON FEDERAL QUESTION

3. Removal is proper under 28 U.S.C. §§ 1331 and 1441(b) and (c) because this court has federal question jurisdiction under WARN. In her Original Petition, Plaintiff specifically asserts claims under WARN.

TIMELINESS OF REMOVAL

4. Less than 30 days have passed since Plaintiff's Original Petition was served on Defendant ObjectSpace, Inc. Accordingly, this Notice of Removal is timely under 28 U.S.C. § 1446(b).

ATTACHMENT OF STATE COURT PLEADINGS

5. Defendant has attached to this Notice as Exhibit A a copy of all pleadings filed in state court.

NOTICE OF REMOVAL GIVEN TO STATE COURT

6. Defendant is filing a Notice of Removal to Federal Court with the County Court at Law No. 4 of Dallas County, Texas, on the date of this filing with the United States District Court for the Northern District of Texas, Dallas Division. A copy of the notice provided to the state court is attached to this Notice as Exhibit B.

Therefore, Defendant ObjectSpace, Inc. respectfully requests that further proceedings in the state court action be discontinued and that Cause No. 01-05742-D be removed to the United States District Court for the Northern District of Texas, Dallas Division, and that this Court assume full jurisdiction over this action as provided by law.

Respectfully submitted,



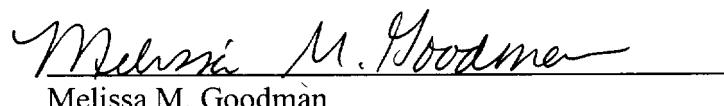
Matt W. Holley
State Bar No. 09875540
Melissa M. Goodman
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Dallas, Texas 75202
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**ATTORNEYS FOR DEFENDANT
OBJECTSPACE, INC.**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served via certified mail, return receipt requested, (7106 4575 1292 3576 9984), on Plaintiff's counsel of record, Andrew R. Korn, Korn, Bowdich & Diaz, L.L.P., 4221 Avondale Avenue, Dallas, Texas 75219, on this 8th day of June, 2001.



Melissa M. Goodman

D-905534.1